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Attorneys for the United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 3:22-cr-00084-SI

v.

**GOVERNMENT'S AMENDED
WITNESS LIST**

TONY DANIEL KLEIN,

Defendant.

The United States of America hereby submits the following list of witnesses it may call to testify in the above-captioned matter, beginning July 10, 2023. The United States may not need to call some of the witnesses listed below, depending on stipulations between the parties. The United States respectfully requests the opportunity to amend this list, both to add or subtract witnesses, as may be necessary during its case in chief or in rebuttal.

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1. Ackerman, Caryn	FBI
2. Armitage, Wendy	Coffee Creek Correctional Facility (CCCF) Nursing Staff ¹
3. Ashton, Heather	Court reporter for Tony Klein deposition
4. Becker, Erik	CCCF Corrections Staff
5. Bowditch, Elizabeth	FBI
6. Bowman, Dave	Investigator with Oregon State Board of Nursing
7. Brasch, Mike	CCCF Nursing Staff
8. [REDACTED]	AV10
9. Bruns, Alana	CCCF Corrections Staff
10. Childress, Ed	CCCF Corrections Staff
11. [REDACTED]	AV1
12. [REDACTED]	AV3
13. [REDACTED]	AV6
14. [REDACTED]	AV20
15. De La O, Karin	CCCF Corrections Staff
16. Dietz, Christina	Formerly incarcerated at CCCF
17. Drew, Chad	Trooper with Oregon State Patrol
18. Dumond, Robert W.	Expert witness for the United States
19. Greiner Flindt, Erin	FBI
20. Hannon, Teresa	CCCF Nursing Staff
21. [REDACTED]	AV15
22. [REDACTED]	AV17
23. Haynes, Scott	CCCF Behavioral Health Staff
24. Hiser, Eric	FBI
25. [REDACTED]	AV13
26. [REDACTED]	AV16
27. [REDACTED]	AV9
28. Koznek, Dane	CCCF Nursing Staff
29. [REDACTED]	AV7
30. Lamb, Roslyn	CCCF Corrections Staff
31. [REDACTED]	AV14
32. Martin, Katherine	CCCF Nursing Staff
33. [REDACTED]	AV2

¹ Witnesses identified as “CCCF Staff” may be current or former staff of the facility.

34. Magee, Erin	FBI Intelligence Analyst
35. [REDACTED]	AV21
36. McKay, Sydney	CCCF Behavioral Health Staff
37. [REDACTED]	AV5
38. Orr, Jacqueline	Previously incarcerated at CCCF
39. Phillips, Tori	Friend of AV2
40. Pries, Christina	CCCF Nursing Staff
41. Riggs, Lewis	CCCF Corrections Staff
42. Russo, Kristina	Previously incarcerated at CCCF
43. [REDACTED]	AV4
44. Sabin, Liz	CCCF Nursing Staff
45. Sage, Ericka	Oregon Dept. of Corrections PREA Coordinator
46. Schain, Lori	CCCF Nursing Staff
47. Springer, Linda	CCCF Nursing Staff
48. Thompson, Carol	CCCF Nursing Staff
49. Van Pelt, Raymond	CCCF Corrections Staff
50. [REDACTED]	AV11
51. Ward, Marylou	CCCF Corrections Staff
52. [REDACTED]	AV8
53. Wolery, Cally	CCCF Nursing Staff

Dated: June 29, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
GAVIN W. BRUCE
Assistant United States Attorney

KRISTEN CLARKE
ASSISTANT ATTORNEY GENERAL

/s/ Cameron A. Bell
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